

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CR. NO. 1:16-CR-80
:
v. :
: (JUDGE Kane)
STEPHEN CHANG, :
:
Defendant. :

INDICTMENT

THE GRAND JURY CHARGES THAT:

FILED
HARRISBURG, PA

MAR 30 2016

COUNT 1
(Travel with Intent to Engage
in Illicit Sexual Conduct)

MARIA E. ELKINS, CLERK
Per VE

On or about December 13, 2014, in Dauphin County, within the Middle
District of Pennsylvania, the defendant,

STEPHEN CHANG,

did travel in interstate commerce for the purpose of engaging in any illicit
sexual conduct, as defined in Title 18, United States Code, Section 2423(f),
with a 13 year old female.

All in violation of Title 18, United States Code, Section 2423(b).

COUNT 2

(Travel with Intent to Engage
in Illicit Sexual Conduct)

On or about October 2, 2015, in Dauphin County, within the Middle
District of Pennsylvania, the defendant,

STEPHEN CHANG,

did travel in interstate commerce for the purpose of engaging in any illicit
sexual conduct, as defined in Title 18, United States Code, Section 2423(f),
with a 14 year old female.

All in violation of Title 18, United States Code, Section 2423(b).

COUNT 3

(Travel with Intent to Engage
in Illicit Sexual Conduct)

On or about March 5, 2016, in Dauphin County, within the Middle
District of Pennsylvania, the defendant,

STEPHEN CHANG,

did travel in interstate commerce for the purpose of engaging in any illicit
sexual conduct, as defined in Title 18, United States Code, Section 2423(f),
with a 14 year old female.

All in violation of Title 18, United States Code, Section 2423(b).

COUNT 4
(Coercion and Enticement)

On or about December 13, 2014, in Dauphin County, within the Middle District of Pennsylvania, the defendant,

STEPHEN CHANG,

did use any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense.

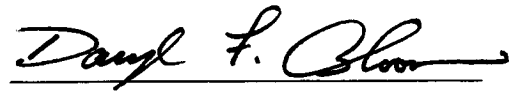
All in violation of Title 18, United States Code, Section 2422(b).

A TRUE BILL

PETER J. SMITH
United States Attorney



Foreperson


DARYL F. BLOOM
Assistant United States Attorney

3-30-2016
Date